

### **REMARKS/ARGUMENTS**

The Office Action dated December 14, 2006 has been received and carefully considered. In this response, independent claims 1 and 129 have been amended. Independent claim 151 has been amended to correct a minor informality. Dependent claim 8 and previously withdrawn claims 104, 106-109, 115-116, and 134-150 have been cancelled without prejudice. Dependent claim 9 has been amended to correct dependency. No new matter was added. Thus, claims 1-5, 7, 9-17, 24-25, 27-50, 52-62, 67-68, 70-82, 85-88, 90-103, 105, 111-114, 117-129, 132, and 151 are currently pending in this application. Entry of the amendments to claims 1, 9, 129, and 151 and the cancellation of claims 8, 104, 106-109, 115-116, and 134-150 without prejudice is respectfully requested. Reconsideration of the outstanding rejections in the present application is also respectfully requested based on the following remarks.

#### **I. THE ALLOWANCE OF CLAIM 151**

At the outset, Applicants notes with appreciation the indication on page 1 of the Office Action that claim 151 has been allowed. Furthermore, the undersigned thanks Examiner Padgett for the courtesies extended during the interview conducted on February 12, 2007, during which Examiner Padgett helped to point out the features and functionalities indicated as allowable in claim 151. Specifically, Examiner Padgett stated that the "configuration" aspects of positioning the substrate in claim 151, as they relate to a method for plasma plating, are distinguishable over the cited prior art references. Examiner Padgett also acknowledged that amendments to independent claims 1 and 129 to include the allowable features and functionalities of claim 151 would likely place all the pending claims in condition for allowance. Accordingly, claims 1 and 129 have been amended in this manner, and thus should now be allowable.

#### **II. THE OBVIOUSNESS REJECTIONS OF CLAIMS 1-5, 7, 9-17, 24-25, 27-50, 52-62, 67-68, 70-82, 85-88, 90-103, 105, 111-114, 117-129 and 132**

Independent claims 1 and 129 stand rejected under 35 U.S.C. § 103(a) as unpatentable over White in view of Sakamoto, Yaginuma or Nimmagadda. Applicants

respectfully submit that, in light of the amendments to claims 1 and 129 to include the indicated allowable subject matter of claim 151 as discussed above, none of the cited references, nor their proposed combinations, recite “positioning a substrate with a threaded surface on a platform within a vacuum chamber, wherein an inwardly facing surface of the substrate faces a center of the platform and an outwardly facing surface of the substrate faces an edge of the platform,” as expressly recited in claims 1 and 129. For at least these reasons, Applicants respectfully submit that the asserted obviousness rejections of claims 1 and 129 are improper and request that they be withdrawn.

Dependent claims 2-5, 7, 9-17, 24-25, 27-50, 52-62, 67-68, 70-82, 85-88, 90-103, 105, 111-114, 117-128 and 132 depend from either claim 1 or 129 and, thus, contain the features recited in the independent claims. Therefore, Applicants respectfully submit that the dependent claims are allowable for at least the reasons given above with respect to claims 1 and 129. As a result, Applicants respectfully request that the rejections of the dependent claims also be withdrawn.

**CONCLUSION**

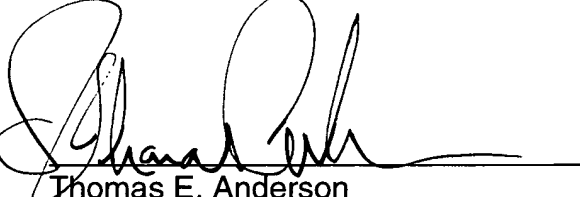
In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number, in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

To the extent necessary, a petition for an extension of time under 37 CFR § 1.136 is hereby made.

Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-0206, and please credit any excess fees to the same deposit account.

Respectfully submitted,

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